

Hearing Date and Time: 7/27/2021 at 10:00 A.M. (EST)

ARCHER & GREINER, P.C.
1211 Avenue of the Americas
New York, New York 10036
Gerard DiConza (gdiConza@archerlaw.com)
Lance A. Schildkraut (lschildkraut@archerlaw.com)
Tel: (212) 682-4940

Co-Counsel for the Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re:

FLYWHEEL SPORTS PARENT, INC., *et al.*,

Chapter 7

Case Nos.: 20-12157 (JLG)

Debtors.¹

(Jointly Administered)

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**TRUSTEE'S REPLY TO OPPOSITION OF 150 AMSTERDAM
AVENUE HOLDINGS LLC TO OBJECTION TO ADMINISTRATIVE
EXPENSE CLAIM NO. 110 PURSUANT TO THE LEASE REJECTION ORDER**

TO THE HONORABLE JAMES L. GARRITY, JR.,
UNITED STATES BANKRUPTCY JUDGE:

Angela Tese-Milner, the chapter 7 trustee (the "Trustee") for the above-captioned debtors, submits this Reply to the Opposition [Dkt. No. 135] (the "Opposition") to the Trustee's Objection [Dkt. No. 123] to Administrative Expense Claim No. 110 Filed by 150 Amsterdam Avenue Holdings LLC ("150 Amsterdam"), pursuant to the Lease Rejection Order [Dkt. No. 90] (the "Lease Rejection Order"), and respectfully states that:

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number, are as follows: Flywheel Sports Parent, Inc. (9114), Flywheel Sports, Inc. (5002), Flywheel Astor Place LLC (5002), Flywheel Buckhead LLC (5002), Flywheel CCDC, LLC (5002), Flywheel NM LLC (5002), Flywheel Park Avenue LLC (5002), Flywheel Playa Vista, LLC (5002), Flywheel San Francisco, LLC (5002), Flywheel Topanga, LLC (5002), Flywheel Walnut Creek LLC (5002), Flywheel Sports Scottsdale, LLC (5002), Flywheel Santa Monica, LLC (5002), Flywheel Williamsburg LLC (5002), Flywheel Domain LLC (5002), and Flywheel Denver Union Station, LLC (5002).

Reply²

1. 150 Amsterdam asserts an Administrative Expense Claim in the amount of \$240,808.84. The Administrative Expense Claim is based on a lease for the ground floor (the “Ground Floor”) and lower level (the “Lower Level”) premises at 150 Amsterdam Avenue, New York, New York. 150 Amsterdam asserts administrative priority rent and other charges for the Ground Floor premises of \$108,239.63, and \$132,569.21 for the Lower Level premises. In its Opposition, 150 Amsterdam acknowledges that a portion of its Administrative Expense Claim, including \$9,660.55 in water charges and \$1,694.43 in legal fees, are for obligations that arose prior to the Petition Date and, accordingly, its Administrative Expense Claim should be reduced by such amounts.

2. After receipt of 150 Amsterdam’s Opposition, the Trustee requested additional documentation and support for the Administrative Expense Claim. Upon receipt of the documents and her review and analysis, the Trustee determined that approximately \$96,000 of the Administrative Expense Claim consists of charges and obligations that arose prior to the Petition Date or after December 1, 2020. The Lease Rejection Order authorized the Objecting Landlords to assert administrative priority claims for lease obligations arising after the Petition Date through December 1, 2020.

3. Annexed hereto as Exhibit A is a spreadsheet, which reflects the Trustee’s analysis of the Administrative Expense Claim and the proposed revised allowed amount. As set forth on the spreadsheet, the amount of the Administrative Expense Claim should be reduced from \$240,808.84 to \$144,462.62. A significant portion of the asserted Administrative Expense Claim is for rent and other lease obligations for the month of December 2020. 150 Amsterdam asserts an administrative priority claim for December 2020 rent in the amount of \$28,649.01 for

² Capitalized terms not otherwise defined herein shall have the meaning given to such terms in the Objection.

the Ground Floor and \$52,104.92 for the Lower Level. December 2020 lease obligations should be reduced to \$940.86 for the Ground Floor and \$504.93 for the Lower Level.

4. The Trustee shared a copy of the spreadsheet with 150 Amsterdam and requested that it respond to the Trustee's analysis. No response was received.

WHEREFORE, for the reasons set forth herein and in the Objection, the Trustee respectfully requests that the Court reduce the Administrative Expense Claim to \$144,462.62, and grant such other and further relief as is just and proper.

Dated: July 20, 2021
New York, New York

Respectfully submitted,

ARCHER & GREINER, P.C.

By: /s/ Gerard DiConza
Gerard DiConza
Lance A. Schildkraut
1211 Avenue of the Americas
New York, New York 10036
Tel: (212) 682-4940
Email: gdiconza@archerlaw.com
lschildkraut@archerlaw.com